

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:)	
)	
THE FINANCIAL OVERSIGHT AND)	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO)	Title III
)	
)	Case No. 17-bk-03283 (LTS)
)	
as representative of)	
)	
)	
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i>)	
)	
)	
Debtor.)	

	X	
In re:)	
)	
THE FINANCIAL OVERSIGHT AND)	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO)	Title III
)	
)	
)	Case No. 17-cv-01685 (LTS)
)	Case No. 17-bk-03566 (LTS)
as representative of)	
)	
)	Re: ECF No. 367
)	
THE EMPLOYEES RETIREMENT SYSTEM OF THE)	
GOVERNMENT OF THE COMMONWEALTH OF)	
PUERTO RICO,)	
)	
)	
Debtor.)	

X

**URGENT UNOPPOSED MOTION TO RESCHEDULE HEARING ON PENDING
DISCOVERY MOTIONS TO AFTERNOON OF MAY 2, 2019**

To the Honorable United States Magistrate Judge Judith G. Dein:

The Financial Oversight and Management Board (the “Oversight Board”) respectfully submits this unopposed urgent motion (the “Urgent Motion”) for an order rescheduling the hearing on the Parties’ pending discovery motions currently scheduled for Thursday, May 2, 2019 at 11:00 a.m. Eastern as set by the Court’s *Order Moving Hearing Date* [ECF No. 479 in Case No. 17-bk-03566] in connection with the *Motion of Certain Secured Creditors of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico for Relief from the Automatic Stay* [ECF No. 367 in Case No. 17-bk-03566] (the “Stay Relief Motion”), to 12:00 p.m. or later that same day. In support of this unopposed Urgent Motion, the Oversight Board states as follows:

1. On April 23, 2019, the Court scheduled a hearing on pending discovery motions in connection with the Stay Relief Motion to occur on May 1, 2019 [ECF No. 467 in Case No. 17-bk-03566].
2. On April 25, 2019, the Oversight Board filed an informative motion [ECF No. 473 in Case No. 17-bk-03566] pursuant to the Court’s request identifying Margaret Dale and William D. Dalsen as counsel to appear in Boston on behalf of the Oversight Board at the May 1 hearing.
3. On April 26, 2019, the Court rescheduled the May 1 hearing for May 2, 2019, at 11:00 a.m. [ECF No. 479 in Case No. 17-bk-03566].
4. Counsel to the Oversight Board (William D. Dalsen) has a personal medical appointment at 8:30 a.m. on May 2, 2019 in Cambridge, Massachusetts, that cannot be rescheduled. Depending on the length of the appointment and potential delays during the appointment and with travel afterward, however, it may be difficult for Mr. Dalsen to arrive at the Boston courthouse by 11:00 a.m. for the start of the hearing.

5. Also on April 26, 2019, counsel to the Oversight Board requested Movants'¹ consent to move the May 2, 2019 hearing start time to 12:00 p.m. or later that same day, subject to the Court's availability; counsel to Movants consented to that request, subject to the Court's availability. Additionally, counsel to the Oversight Board requested the consent of counsel to AAFAF, the UCC, and the Retiree Committee to move the hearing start time to 12:00 p.m. or later; counsel to those parties also consented to this request, subject to the Court's availability.

6. As all parties have consented to this request, no party will be prejudiced should the Court move the start time from 11:00 a.m. to 12:00 p.m. or later.

7. The Oversight Board therefore respectfully requests the Court to move the start time of the May 2, 2019 hearing from 11:00 a.m. to 12:00 p.m. or later on May 2, subject to the Court's availability.

[Remainder of page intentionally left blank]

¹ Movants are: Andalusian Global Designated Activity Company, Glendon Opportunities Fund, L.P., Mason Capital Master Fund, LP, Oaktree-Forrest Multi-Strategy, LLC (Series B), Oaktree Opportunities Fund IX, L.P., Oaktree Opportunities Fund IX (Parallel 2), L.P., Oaktree Value Opportunities Fund, L.P., Ocher Rose, L.L.C., SV Credit, L.P., Puerto Rico AAA Portfolio Bond Fund, Inc., Puerto Rico AAA Portfolio Bond Fund II, Inc., Puerto Rico AAA Portfolio Target Maturity Fund, Inc., Puerto Rico Fixed Income Fund, Inc., Puerto Rico Fixed Income Fund II, Inc., Puerto Rico Fixed Income Fund III, Inc., Puerto Rico Fixed Income Fund IV, Inc., Puerto Rico Fixed Income Fund V, Inc., Puerto Rico GNMA & U.S. Government Target Maturity Fund, Inc., Puerto Rico Investors Bond Fund I, Puerto Rico Investors Tax-Free Fund, Inc., Puerto Rico Investors Tax-Free Fund, Inc. II, Puerto Rico Investors Tax-Free Fund III, Inc., Puerto Rico Investors Tax-Free Fund IV, Inc., Puerto Rico Investors Tax-Free Fund V, Inc., Puerto Rico Investors Tax-Free Fund VI, Inc., Puerto Rico Mortgage-Backed & U.S. Government Securities Fund, Inc., Tax-Free Puerto Rico Fund, Inc., Tax-Free Puerto Rico Fund II, Inc., and Tax-Free Puerto Rico Target Maturity Fund, Inc.

Dated: April 29, 2019
New York, NY

Respectfully submitted,

/s/ Margaret A. Dale

Martin J. Bienenstock (*pro hac vice*)

Brian S. Rosen (*pro hac vice*)

Jeffrey W. Levitan (*pro hac vice*)

Margaret A. Dale (*pro hac vice*)

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*Attorneys for the Financial Oversight and
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representative of the Employees Retirement
System of the Government of the
Commonwealth of Puerto Rico*

CERTIFICATE OF SERVICE

I hereby certify that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all CM/ECF participants in this case.

Dated: April 29, 2019

/s/ Luis F. del Valle-Emmanuelli
Luis F. del Valle-Emmanuelli

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FOR THE DISTRICT OF PUERTO RICO**

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)	Case No. 17-bk-03283 (LTS)
as representative of)	
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THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i>)	
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Debtor.)	

	X	
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**ORDER ON THE OVERSIGHT BOARD'S URGENT UNOPPOSED MOTION TO
RESCHEDULE HEARING ON PARTIES' MOTION TO COMPEL**

Upon consideration of the Motion of The Financial Oversight and Management Board (the "Oversight Board" or "Movants") for an order rescheduling the time for the hearing on the Parties' pending discovery motions on Thursday, May 2, 2019 as set by the Court's *Order Moving Hearing Date* and it appearing (i) that the Court has jurisdiction over this matter pursuant to U.S.C. § 1331 and 48 U.S.C. § 2166(a), (ii) that venue of this proceeding and the Motion in this District is proper under 28 U.S.C. § 1391(b) and 48 U.S.C. § 2167(a), (iii) that notice of the Motion was adequate and proper under the circumstances and that no further or other notice need be given; and after due deliberation and sufficient cause appearing therefore, it is hereby ORDERED that:

1. The Motion is GRANTED as set forth herein.
2. The May 2 hearing is hereby rescheduled for 12:00 p.m. [or a later time]
Eastern time on May 2, 2019.
3. The Court shall retain jurisdiction to hear and determine all matters arising
from the implementation of this Order.

Dated: _____
Boston, Massachusetts
